

# **EXHIBIT 10**

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION  
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5 IN RE: HIGH-TECH EMPLOYEE )  
6 ANTITRUST LITIGATION ) No. 11-CV-2509-LHK  
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10 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY  
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13 VIDEOTAPED DEPOSITION OF SIDDHARTH HARIHARAN  
14 San Francisco, California  
15 Friday, October 12, 2012  
16 Volume I  
17  
18  
19

20 Reported by:  
21 ASHLEY SOEVYN  
22 CSR No. 12019  
23 Job No. 1541277  
24

25 PAGES 1 - 310

Page 1

1           A.    I can't remember, sure.  Maybe.  I would           17:56:32  
2   have to see the document.           17:56:35

3           Q.    Do you remember on any occasion since this           17:56:39  
4   lawsuit was filed giving an interview to any           17:56:41  
5   journalist?           17:56:45

6                   MR. HARVEY:  Objection, vague and           17:56:47  
7   completely irrelevant to this case.           17:56:52

8   BY MR. PURCELL:           17:56:54

9           Q.    Well, obviously relevance isn't an issue in           17:56:54  
10   a deposition, so you can answer the question.           17:56:56

11          A.    Now, that I think -- yeah, I think I do           17:56:58  
12   remember.           17:57:01

13          Q.    Was it just one interview that you gave to           17:57:02  
14   a journalist respecting this case, or more than           17:57:04  
15   one?           17:57:07

16          A.    As far as I remember, I think it was one.           17:57:09

17          Q.    Now, how did you come to give that           17:57:14  
18   interview, how did you schedule that?           17:57:15

19          A.    I think I had that interview scheduled with           17:57:28  
20   Dean.           17:57:31

21          Q.    So it was scheduled through your counsel?           17:57:32

22          A.    Yes.           17:57:37

23          Q.    During that -- strike that.           17:57:37

24                   So just to clarify, you think you met with           17:57:40  
25   a journalist on more than one occasion?           17:57:42

Page 298

1 Q. Do you recall when you had this 17:59:01  
2 conversation with the friend who you worked with at 17:59:02  
3 Zynga? 17:59:04  
4 A. I can't remember the exact date, no. I 17:59:08  
5 can't remember what month. It was after I left 17:59:11  
6 Zynga, I think, for sure. 17:59:12  
7 Q. And this friend of yours who you worked 17:59:16  
8 with at Zynga, what is his or her name? 17:59:19  
9 A. His name is Ray. 17:59:24  
10 Q. What is Ray's last name? 17:59:25  
11 A. Martone. 17:59:27  
12 Q. How is that spelled? 17:59:28  
13 A. M-a-r-t-o-n-e. 17:59:29  
14 Q. Do you recall what Mr. Martone told you 17:59:34  
15 about the facts of this case? 17:59:36  
16 A. Not particularly. He just -- well, you 17:59:39  
17 said of the case? The case wasn't filed yet. 17:59:44  
18 Q. Fair enough. That was a bad question that 17:59:48  
19 I asked. Do you recall what Mr. Martone told you 17:59:49  
20 about the underlying facts? 17:59:51  
21 A. He didn't say very much. All he said was, 17:59:54  
22 "Hey, you work for Lucas, right?" And I said, 17:59:58  
23 "Yeah." And I think he said something like, "Hey, 18:00:01  
24 there's this thing that I'm thinking about the DOJ" 18:00:04  
25 or something. I can't remember what he said 18:00:08

1 exactly, but he said something about conspiracy or 18:00:11  
2 something, and I looked it up on Google. 18:00:17

3 Q. And when you looked it up on Google, what 18:00:21  
4 did you find? 18:00:30

5 A. I found a DOJ ruling against some company 18:00:30  
6 involving Lucas. 18:00:34

7 Q. And at some point after that, did you 18:00:36  
8 contact an attorney? It's just a yes-or-no 18:00:37  
9 question. I'm not asking what you said to them? 18:00:40

10 A. Yes. 18:00:43

11 Q. And what attorney did you contact? 18:00:44

12 MR. HARVEY: And I think for this, I think 18:00:51  
13 it's fair to identify the law firm rather than the 18:00:52  
14 individual. 18:00:54

15 THE WITNESS: Lief, Cabraser. 18:00:55

16 BY MR. PURCELL: 18:00:58

17 Q. How did you come to select Lief, Cabraser 18:00:58  
18 as the firm to call? 18:01:02

19 A. It -- a mutual friend of Ray. 18:01:09

20 Q. Who is the mutual friend of Ray? 18:01:10

21 A. Mr. Dean Harvey. 18:01:17

22 Q. So did Mr. Martone tell you, "I have a 18:01:24  
23 friend who is a lawyer who might be able to 18:01:26  
24 represent you"? 18:01:31

25 A. I can't remember exactly what he said. 18:01:35

1 Q. But Mr. Martone was the one who referred 18:01:36  
2 you to Mr. Harvey and the Lieff, Cabraser firm? 18:01:38  
3 A. Yes. 18:01:41  
4 Q. If you were successful in this case and 18:01:46  
5 plaintiff proved liability, what do you expect to 18:01:49  
6 recover? 18:01:53  
7 A. What do I personally -- 18:01:57  
8 Q. Correct. 18:01:59  
9 A. It's not about me. It's about the class 18:02:00  
10 members of this case. 18:02:02  
11 Q. I understand it's broader than just you, 18:02:03  
12 but your personal expectation. What personally do 18:02:05  
13 you expect to recover if plaintiffs prevail on 18:02:09  
14 liability in this case? 18:02:13  
15 A. Well, you have to go back to my motive for 18:02:18  
16 doing this case. I don't really care. I don't 18:02:20  
17 really care. I don't even know what I would do with 18:02:22  
18 it. I care about the class members. I care about 18:02:24  
19 justice for them. 18:02:26  
20 Q. Do you expect to recover your own damages 18:02:28  
21 if plaintiffs were able to prove that you were 18:02:32  
22 underpaid as a Lucasfilm employee because of some 18:02:35  
23 conspiracy? 18:02:41  
24 A. I'm sorry, there was a lot of -- please 18:02:41  
25 rephrase that question. 18:02:45